

Privacy Policy

Who are we?

In this privacy policy 'We', 'us' 'our' and /or the 'Inovayt Group' refer to Inovayt Pty Ltd (Inovayt) ACN 126 141 982 (Australian Credit Licence 391333), Inovayt Wealth Pty Ltd ACN 155 205 431 (Inovayt Wealth) and our related businesses.

Inovayt Wealth is an Australian Financial Services Authorised Representative (Representative Number 435348) of Alliance Wealth ABN 93 161 647 007.

The Inovayt Group provides a range of financial services and products. If you interact with us for the purposes of obtaining Life Insurance and / or Financial Product Advice, Inovayt Wealth will be the holder of your Personal Information.

If you interact with us for the purposes of Credit advice and our financial services including for obtaining loans and mortgages, Inovayt will be the holder of your Personal Information.

Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information. By using our services, you consent to our storage, maintenance, use and disclosing of personal information in accordance with this privacy policy.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant laws.

Personal information

When we refer to 'personal information' we mean information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Personal information: The types of personal information we may collect about you include:

- your name;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your age and/or date of birth;
- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Services, including through the use of Internet cookies, your communications with our online Services, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Services, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

Sensitive information: Sensitive information is a subset of personal information that is given a higher level of protection under the Australian Privacy Principles. Sensitive information is a subset of personal information that is given a higher level of protection under the Australian Privacy Principles. Sensitive information means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records or biometric information.

If you are applying for finance we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses. If you apply for any insurance product through us we may also collect your health information and medical records. We will only collect sensitive information from you with your consent.

Using government identifiers: If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

Why we collect your personal information

We collect personal information for the purposes of assessing your application for finance, managing that finance and providing related services to you. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

This includes the following purposes:

- to contact and communicate with you about our Services, to run promotions or offer additional benefits to you;
- to contact and communicate with you about our Services;
- for internal record keeping, administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our Services, associated applications;
- for advertising and marketing, including to send you promotional information about our products and services and information that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have;
- if you have applied for employment with us; to consider your employment application; and
- if otherwise required or authorised by law.

If you have provided us with sensitive information, we will only use that information with your consent and as is reasonably necessary or directly related to our functions and activities in providing our services to you, or as permitted by Australian law.

How do we collect your personal information?

We may collect personal information either directly from you (where reasonable and practicable), or from third parties, such as finance brokers, accountants and lawyers, including where you:

- contact us through our website;
- submit any of our online sign up forms;
- communicate with us via email, telephone, SMS, social applications (such as LinkedIn, Facebook or Twitter) or otherwise;
- interact with our website, social applications, services, content and advertising; and
- invest in our business or enquire as to a potential purchase in our business.

Do we disclose your personal information?

We may disclose your personal information:

- to prospective funders, financial service providers or other intermediaries in relation to your finance requirements;
- to other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres, lenders, mortgage insurers, trade insurers and credit reporting bodies;
- third party service providers for the purpose of enabling them to provide their services, to us, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, couriers, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- to associated businesses that may want to market products to you;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as finance brokers, lawyers and accountants;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth) or in accordance with a subpoena or summons issued by a court;
- to investors, agents or advisers, or any entity that has an interest in our business; or
- to your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- b) you have consented to us making the disclosure.

Overseas disclosure: where we disclose your personal information to third parties listed above, these third parties may store, transfer or access personal information outside of Australia, including but not limited to, Malaysia and the Philippines.

Credit information

The personal information we hold about you may also include credit information. Credit information is information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

We may collect the following kinds of credit information and exchange this information with credit reporting bodies and other entities:

- credit liability information, being information about your existing finance which includes the name of the credit provider, whether the credit provider holds an Australian Credit Licence, the type of finance, the day the finance is entered into, the terms and conditions of the finance, the maximum amount of finance available, and the day on which the finance was terminated;
- repayment history information which is information about whether you meet your repayments on time;
- information about the type of finance that you are applying for;
- default and payment information; and
- court proceedings information.

We exchange this credit information for the purposes of assessing your application for finance and managing that finance.

This credit information may be held by us in electronic form on our secure servers and may also be held in paper form. We may use cloud storage to store the credit information we hold about you. The cloud storage and the IT servers may be located outside Australia, including but not limited to, Malaysia and the Philippines.

When we obtain credit information from a credit reporting body about you, we may also seek publicly available information and information about any serious credit infringement that you may have committed.

Notifiable matters

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. You may request to have these notifiable matters (and this privacy policy) provided to you in an alternative form.

We exchange your credit information with credit reporting bodies. We use the credit information that we exchange with the credit reporting body to assess your creditworthiness, assess your application for finance and manage your finance.

If you fail to meet your payment obligations in relation to any finance that we have arranged or you have committed a serious credit infringement then we may disclose this information to a credit reporting body.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. Please see the heading 'Access and correction to your personal and credit information' below.

Sometimes your credit information will be used by credit reporting bodies for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the credit reporting body at any time to request that your credit information is not used in this way.

You may contact the credit reporting body to advise them that you believe that you may have been a victim of fraud. For a period of 21 days after the credit reporting body receives your notification the credit reporting body must not use or disclose that credit information. You can contact <https://www.equifax.com.au/> for more information.

Direct marketing

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 1300 354 355 or by writing to us at info@inovayt.com.au.

If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete. However, we will take reasonable steps to correct personal information we hold, if we believe that it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Your rights and controlling your personal information

Your choice: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict and unsubscribe: To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information.

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. You also have the right to contact the relevant privacy authority.

How safe and secure is your personal information that we hold?

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Links

Our website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them. Those websites are not governed by this Privacy Policy.

Cookies

We may use cookies on our online Services from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. If and when you choose to provide our online Services with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our online Services.

Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our complaints officer Nick Reilly at nickr@inovayt.com.au.

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to our external Dispute Resolution Scheme, The Australian Financial Complaints Authority (AFCA) which can be contacted at <https://www.afca.org.au/about-afca/> or by telephone on 1800 931 678 or the Privacy Commissioner which can be contacted at either www.oaic.gov.au or by telephone on 1300 363 992.

Further information

You may request further information about the way we manage your personal information or you may request this privacy policy in an alternative form by contacting us at info@inovayt.com.au.

Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence, we may change this privacy policy from time to time or as the need arises. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

Last update: 1 March 2021